

Gregg Roberts
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Assignee of Record and Judgment Creditor, Pro Se

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

In re Jihad Saker,
Debtor

Gregg Roberts,
Plaintiff,
v.

Jihad Saker,
Defendant

Main Case #6:23-bk-10976-SY
Chapter 7
Adv. Proc. Case #6:23-ap-01055-SY

**RESPONSE IN OPPOSITION TO
MOTION TO DISMISS FIRST
AMENDED COMPLAINT**

Judge: Hon. Scott H. Yun

The instant Motion does little but rehash arguments made in the first Motion to Dismiss – arguments that this Court evidently found unworthy of mention at the hearing on that Motion.

The instant Motion repeats the groundless position that judgments arising out of lawsuits where only unintentional torts were alleged cannot be found nondischargeable. Even if that were true, the Motion falsely states that Roberts’ allegations “[contradict] the findings of negligence claim in the state court case” (2:7), as if allegations in a bankruptcy adversary proceeding under

RESPONSE IN OPPOSITION TO MOTION TO DISMISS FIRST AMENDED COMPLAINT

1 523(a)(6) cannot *go beyond* state court findings. Debtor Counsel surely knows better than to
2 make such assertions. Even worse, he and Debtor misrepresent *for the second time* the facts
3 about that previous litigation. *See pages 8-9 for the devastating details.*
4

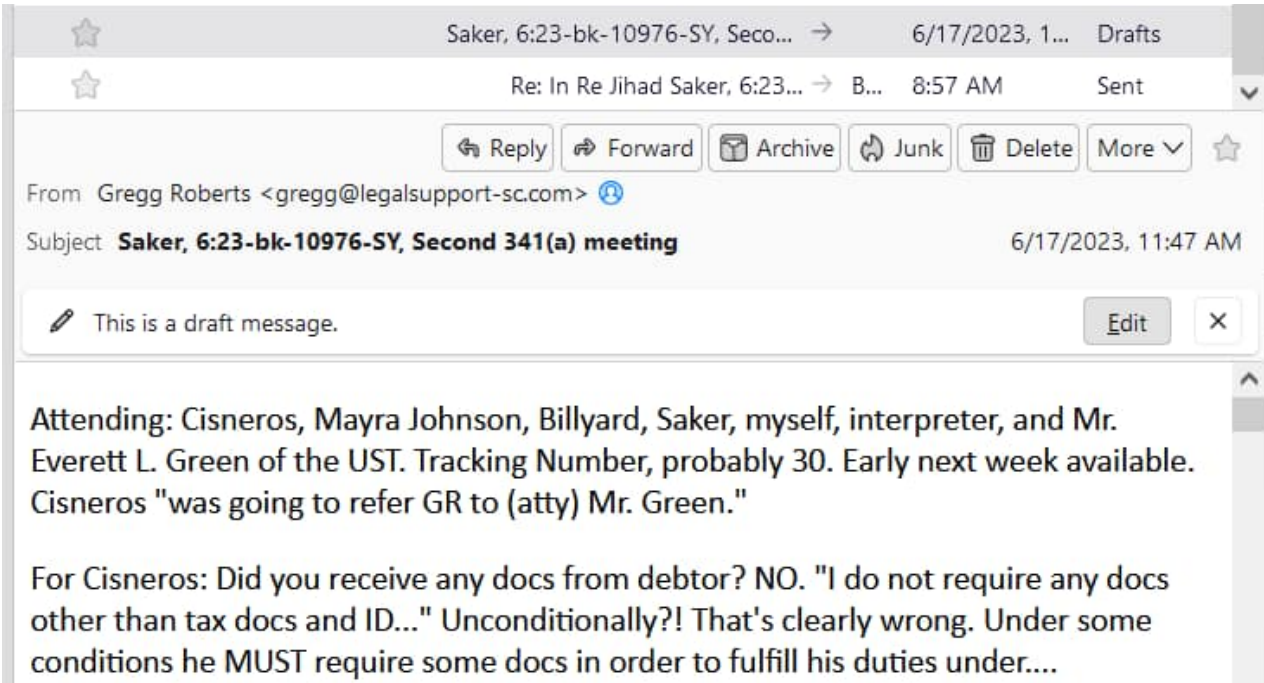
5 The Motion accuses Roberts of making a false statement regarding the provision of
6 documents by the Debtor to the Trustee:
7

8 The Complaint alleges that although Roberts reported these issues to the Trustee
9 and that the Trustee never requested that Saker produce missing records [*sic*].
10 This is false. **Chapter 7 Trustee Arturo Cisneros requested extensive**
11 **documents from Counsel, in which [*sic*] Counsel provided to the Trustee**
12 **whatever Debtor had records of and access to.** Because these records go back
more than 2 years in accounts that are now closed, Debtor is unable to access
every record that Roberts demanded.

13 8:3-8.
14

15 Roberts based his statement in large part on Trustee Cisneros' own words, at the only
16 Meeting of Creditors attended by Saker, on May 17, 2023. The screenshot below is a true and
17 correct copy of the relevant portion of notes taken by Roberts during that Meeting. Roberts
18 cleaned up his rapidly typed notes and entered various comments on them for further action a
19 few times over the ensuing month. This resulted in a last modified date shown in the screenshot
20 of one month after the Meeting. Roberts was surprised that Trustee Cisneros went beyond stating
21 whether he had requested documents from Debtor Saker, denying that he EVER requires any
22 documents other than tax documents and identification. How can he possibly fulfill his duties
23 under 11 USC 704 if this is actually his unwavering policy?
24
25
26

Screenshot of Roberts' Contemporaneous Notes from Meeting of Creditors



Back to the more specific point of whether the Trustee requested documents from Saker, Roberts requested copies of any such documents from Trustee Cisneros' office. Roberts never received any such documents, although his request was acknowledged. Exhibit 1 is a true and correct copy of email messages between Roberts and Trustee Cisneros' office, from which these excerpts are taken:

1. "I further request copies of all of the debtor's documents currently in your possession, or that come into the possession of your office in the future, other than the ones that you are not allowed to give me." P. 2, last paragraph. This follow-up request was made on May 5, twelve days before the Meeting.
2. "Please let me know whether you intend to demand the production of additional documents from the debtor Jihad Saker, and if not, why not. / I request copies of all

documents you have received, or that you receive from Mr. Saker before the May 17 Meeting, other than those that you are forbidden by law from providing to me.” P. 2, paras 4-5. This initial request was made on April 20.

3. Trustee Cisneros never specifically acknowledged Roberts’ request for records, instead responding with side issues such as whether Roberts was an attorney (p. 5, para 2) and assuring him that Arabic translators were not difficult to obtain (p. 10, para 1).
4. On May 5, Roberts asked Cisneros “In view of the information that I already sent you, could you tell me why you have not [apparently] already demanded statements from the Saker Enterprise account?” P. 7, para 6. Cisneros never answered that question.

Roberts confirmed by a review of his email system that he never received any Saker documents from Cisneros’ office, either from his address or that of his assistant Mayra Johnson. Roberts also spoke with Ms. Johnson by telephone on June 3. She told Roberts that she saw no indication in her records that Trustee Cisneros ever requested any documents from Debtor Saker, and that it is not his practice to request any such documents other than tax documents and identification, just as Trustee Cisneros stated at the Meeting.

In view of all this, what was Roberts to conclude, other than what he wrote in the FAC, which the instant Motion waves away as “false”? This is yet another misrepresentation of fact by Debtor Saker and counsel – another “false oath *or account*.” See below. Indeed, it seems to go so far as to perpetrate a fraud upon the Court, in an attempt to discredit Roberts while also trying to wave away the smoke that usually means there’s fire.

1 With regard to the 727 claim, the Motion again has the Debtor trying to hide behind the
2 skirts of the Trustees. But established law allows creditors to bring exactly this kind of action
3 *regardless of whether the Trustees join in it*. The instant fact pattern might provide an example
4 of why Congress afforded creditors this right under bankruptcy law.
5

6 **“False Oath or Account”**
7

8 In another misrepresentation of *law*, the Motion attempts to get the Debtor off the hook
9 by saying that the statements about which Roberts complains “were either not made under oath
10 or were made to the best of Defendant’s recollection without bad faith”. 2:14-15. As to the first
11 prong of this allegation, 11 USC 727(a)(4)(A) provides for denial of discharge because of *false*
12 *oaths or accounts*, not just *false oaths*. Again, Debtor Counsel obviously knows this, but chose to
13 lie by omission. Would Debtor Counsel resort to such tactics if he were up against someone with
14 a law license?
15
16

17 As to the second prong of the allegation, it disregards the required presumption that all
18 factual (nonconclusory) allegations in a Complaint are true and correct for purposes of a Motion
19 to Dismiss. Roberts alleged “92. The debtor’s false oaths and accounts were made knowingly
20 and fraudulently” (p. 19). More specifically, Roberts further pointed out the contradiction
21 between the Debtor’s statement “I had no money even to feed myself” and a total balance of
22 more than \$7000 in three bank accounts, plus an undisclosed amount of funds in the Saker
23 Enterprise account. *FAC*, p. 13.
24
25
26

1 Roberts went on to document, in detail over the next several pages, how we know that
2 various statements by the Debtor were knowingly false. The instant Motion *even repeats one of*
3 *the false statements documented there*: that a former holder of a now-closed bank account cannot
4 go to the bank, show ID, and obtain such statements at nominal cost: “Because these records go
5 back more than 2 years in accounts that are now closed, Debtor is unable to access every record
6 that Roberts demanded.” 8:6-8. Roberts has never heard of a bank where that is true. Debtor
7 Saker nowhere asserts that he actually *tried to obtain* statements after the accounts were closed.
8
9

10 On June 3, Roberts called the Wells Fargo branch at 296 W. Highland Ave, San
11 Bernardino, CA 92405 – which a Google search indicated was the nearest branch to debtor’s
12 home – at (909) 886-4824. A banker there who identified himself as George told Roberts that
13 there would be no problem printing statements for a closed account going back three years, and
14 no charge for the statements. Roberts was very clear in stating that he was asking about a
15 situation in which the account was closed. George stated that he would be able to print out 12
16 months’ worth of statements without an appointment, but if the customer wanted more than that,
17 an appointment would be recommended.
18
19

20 Nor does Debtor Saker say why he was able to provide Roberts with three years’ worth of
21 business statements for E Street Market from Wells Fargo and a year’s worth of personal
22 statements from Arrowhead Credit Union, but ZERO statements for the Saker Enterprise Wells
23 Fargo account. The contrast is damning. So “Debtor is unable to access every record that Roberts
24
25
26

1 demanded” is yet *another* “false oath or account”! In violation of the First Rule of Holes, *Debtor*
2 *and Counsel just keep digging!*
3

4 In another violation of the Rules of Professional Conduct and 11 USC 727(a)(4)(A), the
5 Motion repeats an argument that is wrong on both the facts and the law, an argument that was
6 already thoroughly refuted in Roberts’ Response to the Motion to Dismiss the original
7 Complaint. The Motion states: “The judgment against Defendant for wrongful death negligence
8 was entered in 2017. If Plaintiff wanted to bring an action for willful or malicious conduct, he
9 must have done that at the time the claim was filed in state court” (9:8-9) – implying that there
10 WASN’T ANY intentional tort claim in the state court complaint. But, as Roberts demonstrated,
11 THERE WAS. *See the screenshot from Roberts’ Response on the following page.*
12
13

14 Consider: If the Debtor really has no significant nonexempt assets or income as stated in
15 his Schedules, why are he and/or his family spending significant sums on legal representation to
16 keep dragging out this litigation with another Motion to Dismiss? *Why haven’t they already just*
17 *filed an Answer?*
18

19 Indeed, why didn’t the Debtor simply *produce the required records in the state court*
20 *litigation in the first place?* If those records would have shown the poverty of which the Debtor
21 now complains, Roberts would not have been able to take anything from him in the state court
22 litigation. The Saker Enterprise records *probably* show something damning, to be worth all this
23
24
25
26

B. DETAILED RESPONSES TO THE MOTION REGARDING THE 523(a)(6)

CAUSE OF ACTION

1. Statute of Limitations Objection

MOTION: “Plaintiffs allegations are barred by the statute of limitations. Bankruptcy Court applies state law statute of limitations. In this case, Plaintiff allegations willful or malicious conduct is barred by the 2 year statute of limitations in CA for intentional torts. Therefore, if Plaintiff wanted to assert intentional tortious claims against Defendant, it must have been brought within 2 years of the act. Accordingly, the statute of limitations as to willful or malicious or intentional torts has run.” 3:20-22.

RESPONSE: This is a shocking misstatement of both the relevant facts of this case and the applicable law. The state court Complaint DID allege intentional tort, at Item 10(c):

SHORT TITLE: LAWLER, et al. v., AHALENA HOOKAH LOUNGE, et al.	CASE NUMBER CIVDS1607235
---	-----------------------------

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):
- a. ☐ Motor Vehicle
 - b. ☒ General Negligence
 - c. ☒ Intentional Tort
 - d. ☐ Products Liability
 - e. ☒ Premises Liability
 - f. ☒ Other (specify): Wrongful Death

Ex. I, p. 3.

DE #11, p. 6.

trouble to cover up. But again, if they turn out not to, it doesn’t matter. *The violation is in the cover-up*, as documented in the lengthy footnote on pages 22-23 of the FAC.

Regarding the FAC’s 523-related allegations, the Motion again fails to presume their truth in the discussion about Saker’s “mindset,” complaining multiple times that “there is no evidence.” 5:23-26. Roberts, of course, like all creditors, *has no choice but to make allegations*

RESPONSE IN OPPOSITION TO MOTION TO DISMISS FIRST AMENDED COMPLAINT

1 *about the Debtor’s mindset in order to bring an action for willful and malicious injury. On*
2 *summary judgment or at trial, the Debtor’s mindset can be, and often is, inferred from his*
3 *actions, his level of experience in life, and from the various facts of the situation. But all of that*
4 *is getting ahead of ourselves at this stage of the litigation. Right now this Court must assume the*
5 *truth of the allegations and decide only whether the FAC is well pled and gives rise to facially*
6 *plausible causes of action. By virtue of the changes between the original Complaint and the FAC*
7 *– changes that Roberts based on the Court’s statements at the hearing on the Motion to Dismiss*
8 *the original Complaint – there is no reasonable doubt that the FAC meets that standard.*

11 **Agency “Leftovers” in the FAC from the Original Complaint**

13 In his First Amended Complaint (“FAC”), Roberts inadvertently neglected to delete two
14 allegations from the Original Complaint that allude to Saker’s “agent” *as an alternative to*
15 *alleging that the Debtor himself caused the willful and malicious injury:*

17 16. Nor does it matter whether the ultimate victims of the willful and malicious
18 acts by the debtor ***and/or*** his agent were not the same as the person to whom the
alcohol and cocaine were given....

19 ...

21 95. The actions and/or omissions of ***Saker and his agent*** leading to the debt were
22 done intentionally, were wrongful, were done without just cause or excuse, and
injury was substantially certain to result from them.

24 Considering that all the other agency-related allegations in the original Complaint were
25 deleted – thus there remain utterly insufficient factual allegations in support of a cause of action

1 as to an agent, it should be obvious to Debtor Counsel and this Court that Roberts no longer has
2 any intention of relying on an agency argument. Roberts explicitly waives any such argument,
3 which has already been ruled out by this Court. Roberts also notes FRBP 7008 and
4 FRCP 8(d)(2), "If a party makes alternative statements, the pleading is sufficient if any one of
5 them is sufficient."
6

7
8 Accordingly, it hardly seems worth the trouble, but if the Court so orders, Roberts will
9 remove those agency "leftovers" from a Second Amended Complaint if given leave to file one.
10 But it would seem that judicial economy would dictate that the Order that resolves the instant
11 Motion could simply state that no agency argument will be entertained in this case, no discovery
12 directed towards supporting such an argument shall be valid, and so forth.
13

14 CONCLUSION

15 After the improvements made in the FAC relative to the original Complaint, if there is
16 still any need for further amendments, they should certainly be granted.
17

18 Roberts hereby declares under penalty of perjury that all the factual statements in the
19 foregoing are true and correct to the best of his knowledge, information, and belief.
20

21 Respectfully submitted this 3rd day of June, 2024.

22 
23

24 Gregg Roberts
25

Exhibit 1

Subject: RE: In Re Jihad Saker, 6:23-bk-10976-SY
From: Mayra Johnson <MJohnson@mclaw.org>
Date: 5/5/2023, 4:34 PM
To: Gregg Roberts <gregg@legalsupport-sc.com>
CC: Amanda Billyard <abillyard@bwlawcenter.com>, Arturo Cisneros <arturo@mclaw.org>

Good afternoon Mr. Roberts,

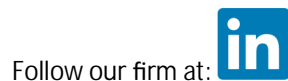
Thank you for your email. I am copying the Trustee at his preferred email address to review the below.

Thank you.

Mayra Johnson
Trustee Administrator



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From: Gregg Roberts <gregg@legalsupport-sc.com>
Sent: Friday, May 5, 2023 4:06 PM
To: AMCTrustee <amctrustee@mclaw.org>
Cc: Amanda Billyard <abillyard@bwlawcenter.com>
Subject: Re: In Re Jihad Saker, 6:23-bk-10976-SY

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Trustee Cisneros,

I just left a voicemail with your office pursuant to this matter.

I have seen no reply or phone call in response to the email below.

Please let me know whether you intend to demand the production of additional documents from the debtor Jihad Saker, and if not, why not.

I request copies of all documents you have received, or that you receive from Mr. Saker before the May 17 Meeting, other than those that you are forbidden by law from providing to me.

Gregg Roberts

<http://legalsupport-sc.com>

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On 4/20/2023 6:12 PM, Gregg Roberts wrote:

Trustee Cisneros,

I attended the 341 meeting pursuant to the above-referenced case this past Tuesday morning. Mr. Saker was unable to attend due to alleged illness. The meeting has been continued to May 17 at noon.

The debtor in this case has a judgment of approximately \$2.8 million with myself as the judgment creditor (assignee of record) as a result of three wrongful deaths that occurred on his property in 2014. One of the false statements on his petition is that most of his debt is consumer debt. In fact, more than 90% of his debt consists of his judgment debt to me.

Mr. Saker is making a mockery of the judicial process intended only to benefit honest debtors in the bankruptcy court. As a result, I urge you to demand additional documents from this debtor.

In an effort to work together to ferret out the truth, I further request copies of all of the debtor's documents currently in your possession, or that come into the possession of your office in the future, other than the ones that you are not allowed to give me. I believe this is justified because I already have evidence that the debtor has been squirreling away cash over the last several years. See the attached Excel file, as well as the conveniently

processed PDF of bank statements for the last three years from one of Mr. Saker's bank accounts. You can Find text in the document and copy text out of it for your own analysis.

I cannot send the Arrowhead statements via email because the 61 MB file is too large. Please let me know if you would like me to provide the file through Dropbox. Because of chain of custody considerations, I understand that you might prefer to receive the documents directly from the debtor through counsel.

The evidence I have obtained includes twelve instances of "Withdrawal Made In A Branch/Store" totaling \$39,588.81 between September 2020 and September 2021, and eight ATM Withdrawals totaling approximately \$5,233.25 between January 2020 and July 2021 from the E Street Market account at Wells Fargo. In addition, there were two cash withdrawals of \$10,004.99 for the debtor's personal Arrowhead FCU account on the same day, March 3, 2021. Those withdrawals were made close in time to a cash withdrawal of \$10,099.99 on March 26, 2021, which is part of the total referenced above. These amounts are more sporadic, and are in much higher amounts, than would be required to maintain enough change in a convenience store cash register to do business. It is essential to my interests, as well as the integrity of this proceeding, that an accounting reveal the disposition of all that cash. If it has been moved for the purpose of preventing assets from being available to creditors, obviously we both need to know about that.

In addition there is a large, suspicious omission in the records production. Mr. Saker was ordered to turn over the past three years of bank records, but he has entirely withheld the statements from one of his business accounts. I discovered the existence of that account by analyzing over 200 pages of statements that he did provide (the "E Street Market" statements). That analysis revealed numerous transfers to that other mystery account (the "Saker Enterprise Inc." account). When I asked Mr. Saker's state court counsel about these omissions, there was no response, and then his bankruptcy petition followed about a week later. I need the 36 months' worth of statements from the Saker Enterprise, Inc. account. That account could show even more cash withdrawals, and/or more recent ones than those already identified. It could even reveal the assistance of another hidden account.

Finally, there is clear evidence of commingling of personal and corporate assets in the statements I have reviewed. The commingling includes many payments to Nationstar, which is apparently the company handling Mr. Saker's home mortgage, as well as Spectrum Internet and a satellite TV service for one of his family members. I did not enter all the Nationstar payments into the spreadsheet, but there were approximately \$35,000 worth of them in total. Because of that commingling, it may be prudent of you to demand all corporate bank statements as well as personal bank statements.

Finally, Mr. Saker also allowed his store to go into foreclosure, thereby reducing the value of his shares in the corporation. That dissipation of an asset clearly violates one of the key state court orders.

Respectfully,

Gregg Roberts

Judgment Creditor / Assignee of Record

cc: Debtor Counsel Amanda Billyard

--

Gregg Roberts

<http://legalsupport-sc.com>

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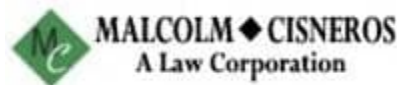
Subject: RE: In Re Jihad Saker, 6:23-bk-10976-SY
From: Arturo Cisneros <arturo@mclaw.org>
Date: 5/7/2023, 9:40 AM
To: Mayra Johnson <MJohnson@mclaw.org>, Gregg Roberts <gregg@legalsupport-sc.com>
CC: Amanda Billyard <abillyard@bwlawcenter.com>

Thanks, Mayra.

Mr. Roberts: are you an atty? If not, I would suggest that you consult/retain a bk atty as I, as trustee in this case, am prohibited from providing legal advice. Please see the deadlines set forth in the 341(a) notice as your rights as a creditor will be affected. I believe I continued this matter to an hour (only matter set) where you and/or your counsel will have an opportunity to question the Debtor under oath. If the Debtor fails to appear again, I will ask the clerk to dismiss the case. In the meantime, if you discover undisclosed assets, please let me know. I am in the office today until 4ish if you wish to discuss further, but please note that I cannot provide legal advice.

Very truly yours,

Arturo M. Cisneros



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From: Mayra Johnson <MJohnson@mclaw.org>
Sent: Friday, May 5, 2023 4:35 PM
To: Gregg Roberts <gregg@legalsupport-sc.com>
Cc: Amanda Billyard <abillyard@bwlawcenter.com>; Arturo Cisneros <arturo@mclaw.org>
Subject: RE: In Re Jihad Saker, 6:23-bk-10976-SY

Good afternoon Mr. Roberts,

Thank you for your email. I am copying the Trustee at his preferred email address to review the below.


Ex. 1, Page 5 of 10

Thank you.

Mayra Johnson
Trustee Administrator



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Subject: Re: In Re Jihad Saker, 6:23-bk-10976-SY
From: Gregg Roberts <gregg@legalsupport-sc.com>
Date: 5/7/2023, 10:20 AM
To: Arturo Cisneros <arturo@mclaw.org>

Mr. Cisneros,

Thank you so much for responding to my message on Sunday.

I am not an attorney, but I have been enforcing judgments in Southern California for 10 years now. I have held my own against very aggressive defense counsel, obtaining substantial compromises in all three of my bankruptcy battles thus far.

I am in the process of finalizing my own motion to dismiss the Saker case as we speak. The two reasons that should most interest your office are (1) the hiding of the second business account -- the one in the name of Saker Enterprise, Inc. -- and (2) cash withdrawals from the E Street Market account in the three years prepetition totaling \$44,822.06 -- cash that appears to have been dissipated. I see no reason to assume that cash was not also withdrawn from the missing account -- perhaps much more than \$44,000. I found a criminal record in San Bernardino against Mr. Saker for running an unlicensed gambling establishment. Mr. Saker's son told me in January that Mr. Saker had been behaving erratically and aggressively because of drug abuse, probably methamphetamine.

I am in the process of entering more information into the spreadsheet that I sent you earlier that will better illustrate the details of the suspicious transactions. Of course you will be served with a copy of the Motion, to which the spreadsheet will be an exhibit. I hope to file and serve the motion by tomorrow or Tuesday at the latest, but that doesn't give you much time for more records to be demanded, obtained, and produced to all of us in time for the May 17 meeting.

In view of the information that I already sent you, could you tell me why you have not already demanded statements from the Saker Enterprise account? Mr. Saker is apparently the sole shareholder, and he certainly controlled the funds in both accounts. He also used corporate funds to pay personal bills. I understand that commingling does not automatically indicate bankruptcy fraud, but it is another indicator of Saker's disregard for the law and for proper business procedures. And all of the conduct I have described above casts doubt on Saker's credibility as a witness regarding his own financial affairs.

A final note -- at the last state court proceeding In January, Saker requested that an Arabic translator be provided for him at the debtor examination that was to take place April 7. If he has not requested an Arabic translator for either of the creditors meetings, please consider the implications. Either he doesn't really need a translator, or he plans on stalling for time again on May 17. It will be unacceptable for him to tell us at the second 341 meeting that he doesn't understand my questions because of a language barrier and he needs more time to get a translator. He has to request a translator NOW -- assuming it is not already too late -- or forfeit the right to make any excuses about his English proficiency. I will ask my questions at a reasonable speed, but I will not dumb my questions down. If the Trustee's office has no obligation or funds to provide an Arabic translator, or one is not available for May 17, Mr. Saker will need to provide his own translator at his own expense, or again

forfeit any related rights.

Gregg Roberts

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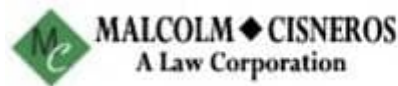
On 5/7/2023 9:40 AM, Arturo Cisneros wrote:

Thanks, Mayra.

Mr. Roberts: are you an **atty**? If not, I would suggest that you consult/retain a bk **atty** as I, as trustee in this case, am prohibited from providing legal advice. Please see the deadlines set forth in the 341(a) **notice** as your rights as a creditor will be **affected**. I believe I **continued** this **matter** to an hour (only **matter** set) where you and/or your counsel will have an opportunity to **question** the Debtor under oath. If the Debtor fails to appear again, I will ask the clerk to dismiss the case. In the **meantime**, if you discover undisclosed assets, please let me know. I am in the **office** today **until** 4ish if you wish to discuss further, but please note that I cannot provide legal advice.

Very truly yours,

Arturo M. Cisneros



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From: Mayra Johnson <MJohnson@mclaw.org>

Sent: Friday, May 5, 2023 4:35 PM

To: Gregg Roberts <gregg@legalsupport-sc.com>

Cc: Amanda Billyard <abillyard@bwlawcenter.com>; Arturo Cisneros <arturo@mclaw.org>

Subject: RE: In Re Jihad Saker, 6:23-bk-10976-SY

Good afternoon Mr. Roberts,

Thank you for your email. I am copying the Trustee at his preferred email address to review the below.

Thank you.

Mayra Johnson

Trustee Administrator



3403 10th Street, Suite 714

Riverside, CA 92501

951-682-9705

951-682-9707 (fax)

www.malcolmcisneros.com



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Malcolm ♦ Cisneros, A Law Corporation, is an AV rated, regional commercial and civil litigation firm with offices across the Western United States in Phoenix, AZ; Irvine and Riverside, CA; Las Vegas, NV; Lake Oswego, OR; Dallas, TX; Seattle, WA.

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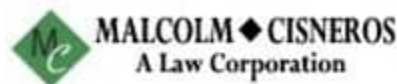
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Subject: RE: In Re Jihad Saker, 6:23-bk-10976-SY
From: Arturo Cisneros <arturo@mclaw.org>
Date: 5/7/2023, 10:27 AM
To: Gregg Roberts <gregg@legalsupport-sc.com>

The OUST provides an interpret to those in need. We will have the ability to request same if necessary and it usually doesn't take very long to get one on the line.

Very truly yours,

Arturo M. Cisneros



Inland Empire
3403 10th Street
Suite 714
Riverside, CA 92501
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2112 Business Center Drive
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From: Gregg Roberts <gregg@legalsupport-sc.com>
Sent: Sunday, May 7, 2023 10:20 AM
To: Arturo Cisneros <arturo@mclaw.org>
Subject: Re: In Re Jihad Saker, 6:23-bk-10976-SY

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Cisneros,

Thank you so much for responding to my message on Sunday.

I am not an attorney, but I have been enforcing judgments in Southern California for 10 years now. I have held my own against very aggressive defense counsel, obtaining substantial compromises in all three of my bankruptcy battles thus far.

see below

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and a resident of the United States. My business address is:
43430 E Florida Ave #F-293, Hemet CA 92544

A true and correct copy of the foregoing document entitled (specify): RESPONSE IN OPPOSITION TO MOTION TO
MOTION TO DISMISS FIRST AMENDED COMPLAINT, with one exhibit

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

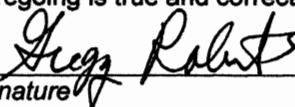
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 06/03/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Debtor Counsel: Amanda Billyard and Richard Sturdevant, via email per written permission, at
abillyard@bwlawcenter.com and rich@bwlawcenter.com.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/03/2024 Gregg Roberts
Date Printed Name


Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
43430 E Florida Ave #F, Hemet CA 92544

A true and correct copy of the foregoing document entitled (*specify*): RESPONSE IN OPPOSITION TO MOTION TO
MOTION TO DISMISS FIRST AMENDED COMPLAINT, with one exhibit

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

I have no access to CM/ECF.

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 06/03/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Debtor: Jihad Saker, 1137 W. 17th St., San Bernardino, CA 92411

Judge: Hon. Scott Yun, United States Courthouse, 3420 Twelfth Street, Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/03/2024

Date

VITO A. VITALE III

Printed Name

Vito A. Vitale III

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.